

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TILLIE SALTZMAN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

VS.

CITIGROUP INC., CHARLES O. PRINCE,
ROBERT E. RUBIN, STEPHEN R. VOLK,
SALLIE L. KRAWCHECK, GARY L.
CRITTENDEN and ROBERT DRUSKIN,

Defendants.

CIVIL ACTION NO. 07-9901-SHS

ECF Filed

LENNARD HAMMERSCHLAG,
Individually, and On Behalf of All Others
Similarly Situated,

Plaintiff,

VS.

CITIGROUP INC., CHARLES PRINCE,
SALLIE KRAWCHECK, GARY
CRITTENDEN,

Defendants.

CIVIL ACTION NO. 07-10258-RJS

**SUPPLEMENTAL DECLARATION OF GERALD H. SILK IN FURTHER
SUPPORT OF THE MOTION OF THE U.S. PUBLIC FUND GROUP FOR
APPOINTMENT AS LEAD PLAINTIFF AND IN OPPOSITION TO ALL
COMPETING MOTIONS**

I, Gerald H. Silk, declare as follows:

1. I am a member in good standing of the bars of the State of New York and of this Court. I am a partner at the law firm of Bernstein Litowitz Berger & Grossmann LLP. I submit this supplemental declaration in support of the Motion filed by the State Teachers Retirement System of Ohio (“Ohio STRS”) and the State Universities Retirement System of Illinois (“SURS”) (collectively, the “U.S. Public Fund Group”) for (i) appointment as Lead Plaintiff, (ii) approval of its selection of Bernstein Litowitz Berger & Grossmann LLP (“Bernstein Litowitz”), and Berman DeValerio Pease Tabacco Burt & Pucillo (“Berman DeValerio”) as Lead Counsel for the Class; and (iii) for consolidation of all related securities class actions under Rule 42(a) of the Federal Rules of Civil Procedure.

2. Attached as Exhibits A through I are true and correct copies of the following documents:

Exhibit A: Ohio STRS’ corrected loss calculation charts;

Exhibit B: Declaration of the Honorable Marc Dann and William J. Neville in Support of the U.S. Public Fund Group’s Motion for Appointment as Lead Plaintiff;

Exhibit C: www.pka.dk/public/forside/this_is_pka.htm (“This Is PKA”);

Exhibit D: Reply Memorandum in Further Support of the Motion of the Public Employees’ Retirement Association of Colorado and Generic Trading of Philadelphia, LLC, *In re Royal Ahold N.V. Sec. & “ERISA” Litig.*, 1:03-MDL-01539 (N.D. Md. filed July 28, 2003);

Exhibit E: Press Release, Automated Trading Desk Sold to Citigroup for \$680 Million (Oct. 3, 2007);

Exhibit F: ATD – Team Director Biographies, *available at* <http://www.atdesk.com/flash.html>;

Exhibit G: ATD Registration Statement, Citigroup Inc. Form S-3ASR, filed Oct. 3, 2007;

Exhibit H: Posting of David K. Whitcomb, PhD, MarketBeat Blog – WSJ.com: Erasing \$120 Billion in Market Cap, <http://blogs.wsj.com/marketbeat/2007/11/05/erasing-120-billion-in-market-cap/>; and

Exhibit I: Letter from Peter S. Linden to Michael J. Pucillo (Jan. 11, 2008).

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this twenty-eighth day of January, 2008

/s/ Gerald H. Silk

Gerald H. Silk